

**AFFIDAVIT OF SPECIAL AGENT TRINITY D. SCHROETER  
IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Trinity D. Schroeter, having been sworn, state:

***INTRODUCTION AND AGENT BACKGROUND***

1. I am a Special Agent of the Federal Bureau of Investigation and have been so employed for over four years. I am currently assigned to a squad that targets human trafficking and crimes against children. Before this assignment, I was assigned to the Public Corruption/Civil Rights Squad for over one year, where I investigated primarily civil rights crimes, including hate crimes. Previously, I investigated national security matters. I have been involved in many complex investigations. I have interviewed defendants, witnesses and victims. I have conducted surveillance, worked with confidential informants, and participated in investigations using court-authorized interception of wire and electronic communications. During my law enforcement career, I have also participated in the preparation and execution of search warrants and in the execution of arrest warrants. Based upon my training and experience, I am familiar with methods of communication between individuals conducting illegal activity, which includes electronic and social media, such as Facebook postings, comments and photos used in furtherance of these illegal activities.

2. This affidavit is being submitted in support of an application for a criminal complaint against Gerald Wayne Ledford for transmitting in interstate or foreign commerce a communication containing a threat to injure the person of another, in violation of 18 U.S.C. § 875(c), and a warrant for his arrest.

3. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents, analysts and witnesses. This affidavit includes only those facts I believe are necessary to establish probable

cause and does not include all of the facts uncovered during the investigation.

### ***FACEBOOK***

4. Facebook is an online social networking service accessible at the website [www.facebook.com](http://www.facebook.com) or via an application (“app”) that can be installed on computer equipment, including a tablet or a cellular phone. Facebook allows users to create profiles and share personal and biographical information; share various content and media including by uploading photographs and videos and sending links to other content; and communicate with other users in a variety of ways, from public discussions to private messaging.

5. When a user creates a Facebook account, they provide Facebook with information to build their online Facebook profile, which can include uploading at least one photo and selecting a Vanity Name and e-mail address that will be associated with the account. The user may choose to provide other information for the “About Me” section of the page, including basic information such as where the user lives, works, and attends/attended school. This information is then displayed on the user’s page. The user may also provide Facebook with other contact information, such as phone numbers and e-mail addresses. In addition, Facebook captures certain basic information about the new account, including the registration date and IP addresses used to access the account. Further, Facebook assigns a unique numerical identifier to the account.

6. The first page of every Facebook account displays a vanity name and the space for both a “Profile Picture” and a “Cover Photo.” Facebook users can post additional photos or even entire photo albums. In my training and experience, most Facebook users frequently build their profiles by uploading and changing photographs on their account.

7. In addition to photographs, Facebook users can write messages, or “Status

Updates,” on their page. This was traditionally referred to as their “wall” or a “wall post,” and is now called a “Timeline.” Unless the user actively hides them, older postings may be viewable on the user’s account by looking back through the “Timeline.” Facebook users can also add “life events” with a date on their “Timeline,” such as the date they began a particular job or were married. As with photographs and other content, the user can select who can view their posts – allowing them to be visible publicly (the default) or limiting their display to only a selected group of individuals.

***PROBABLE CAUSE TO BELIEVE THAT GERALD WAYNE LEDFORD  
COMMITTED A FEDERAL CRIME***

**A. The Facebook Posts**

8. Based on interviews and other investigation, I learned that on October 20, 2014, an employee of the Islamic Society of Boston Cultural Center (ISBCC) discovered two threats posted to the ISBCC’s Facebook page. The ISBCC is located in Roxbury, Massachusetts, and considers itself the cornerstone of the New England Muslim community. According to its website, the ISBCC is not just a mosque, but a dynamic cultural center that is designed to serve the entire community by offering a variety of educational, spiritual, and social services.

9. The first post states, “Mohamed was a child rapist .a murderer and molester.you all will go to hell with you’re father satan..we will destroy you here and in your’re shit hole countrys”. The second post consists of a photo of a man bearing a long gun with the caption, “This is for you.followers of the piece of shit Mohamed ...” A screenshot of these posts is attached as Exhibit 1. Based on the date of discovery and the time stamps on the posts, there is probable cause to believe that they were posted on or about October 19, 2014.

**B. Probable Cause to Believe that the Posts Were Perceived as Threats**

10. There is probable cause to believe that the posts were perceived as threats.

11. The ISBCC's employee immediately made a screenshot of the postings, saved it to a folder on his computer, and then notified another ISBCC employee of the messages. The ISBCC gets hate messages all the time. Although the first ISBCC employee felt that these were just another two offensive postings, the second ISBCC employee's initial response was fearful because the image posted was that of a man with a gun and hinted at violence.

12. The same day as the messages were posted, an otherwise uninvolved citizen who saw the messages responded, "who you trying to threaten?"

**C. Probable Cause to Believe that the Threats were Sent by Gerald Wayne Ledford**

13. Although the ISBCC removed the threatening posts from its Facebook page, it provided a screenshot of the threat postings which included the display name of the posting account as "Gerry Ledford" and a profile photo of a black dog with tan markings. In addition, by typing the content of the threat message — "Mohamed was a child rapist .a murderer and molester.you all will go to hell with you're father satan..we will destroy you here and in your're shit hole countrys". — into Google Web Search, the threat message was viewable for a while on a cached version of the ISBCC's Facebook page.

14. A Facebook search was conducted for all accounts with a display name of "Gerry Ledford." The account with Facebook unique account identification number 100006744708316 was identified as a match for the threatening posts, because its display name was "Gerry Ledford" and its profile photo, also a black dog with tan markings, matched the profile photo of the account that sent the threat messages that the ISBCC had provided the FBI. The display name "Gerry Ledford" was publicly viewable on the home page of this account, and the account's identification number, 100006744708316, was publicly viewable via the account's URL, the name for the specific website that would point an Internet browser to that Facebook account. Although Account 100006744708316 made its posts public, the threat message was not

publicly viewable on there, because when a Facebook user posts to another user's timeline, the posting is viewable only on the page to which it is posted, not on the page belonging to the poster, and in this instance the threat had been posted to the Facebook page for the ISBCC.

15. The majority of the publicly-available content viewable on Account 100006744708316 was personal in nature, including pictures of a person believed to be the user and a dog believed to belong to the user. The account was deactivated November 14, 2014.

16. Account 100006744708316 was observed as being a Facebook "friend" of another Facebook account that also utilized the display name "Gerry Ledford." That account's display name was publicly viewable on its home page, its username of "Gerry.ledford.3" was publicly viewable in its URL, and its Facebook account identification number, 100006969765481, was publicly viewable via a search within Facebook. Account 100006969765481's public posts consisted mostly of photos of a person believed to be the account's owner and a dog believed to belong to the owner, but also contained derogatory/anti-Islamic comments regarding Muslims, though not directly addressing any specific members of the Muslim community. Anti-Islamic postings began on approximately October 22, 2014.

17. Following this and other investigative steps, the FBI obtained warrants to search both Facebook accounts.

18. Based on results from those search warrants, set forth below in subparagraphs (c) through (g), and publicly-available information viewed by FBI personnel, set forth below in subparagraphs (a) and (b), both accounts appear to have been owned and operated by the same person.

a. As of October 20, 2014, Account 100006744708316 displayed a photo of a black dog with tan markings as its profile photo. Account 100006969765481 displayed

what appeared to be the same dog photo posted on its wall as of November 10, 2014.

b. As of October 24, 2014, both accounts had just changed their cover photos to a photo of a white male with a shaved head, wearing a mustache and brown sunglasses. Although those cover photos were not identical, they appeared to depict the same individual.

c. The accounts contain similar user information. According to records obtained from Facebook, Account 100006744708316's user information lists the account's registration date as 6/27/2014; current city as Clinton, IA; hometown as Ashby, MA; gender as male; and education as NMRHS. Account 100006969765481 lists similar user information: a registration date of 6/19/2014; the current city as Clinton, IA; hometown as Ashby, MA; gender as male; and education as North Middlesex Regional High School. Both accounts list the same date of birth for the user.

d. Both accounts primarily use the IP address of 173.28.71.42 to log into those accounts. That same IP address appears to be the one from which both accounts were created, as it appears to be the first IP address used to log into both accounts. According to records obtained from Mediacom Communications Corporation, the 173.28.71.42 IP address is subscribed to a person believed to be Ledford's mother-in-law at the Ledford residence, and who has had the 173.28.71.42 IP address assigned to her from August 27, 2013, through at least mid-January, 2015.

e. The accounts have 22 friends in common, 11 of whom share the last name of Ledford and one of whom shares the last name of Gerald Ledford's apparent mother-in-law.

f. The accounts post some photos that are similar, identical, or that contain

similar or identical subject matter, including:

- i. several photos of a black dog with tan markings, described as “Monkey” in both accounts, some of which appear to be the same photos, one used previously as Ledford’s cover photo for both accounts: image ID # 1497295773838565 from Account 100006744708316, and image ID #s 1538594749716169 and 1535037133405264 from Account 100006969765481;
- ii. the same living room, including a beige sofa and green carpet, as depicted in image ID # 1551294828438659 in Account 100006744708316 and image ID #1538298473079130 in Account 100006969765481;
- iii. what appears to be a similar, but not identical, green rifle with scope as depicted in image ID # 1550425121858963 in Account 100006744708316 and image ID # 1542638645978446 in Account 100006969765481;
- iv. multiple images of a man who appears to be Gerald Ledford: image ID # 1559727074262101 in Account 100006744708316 and image ID # 1527675934141384 in Account 100006969765481, though not identical photos, depict what appears to be Gerald Ledford with a shaved head, brown rounded sunglasses, mustache and bare shoulders/arms in front of a green wall; and
- v. an image of an eagle’s head with the words “Conservative Patriot,” used as the accounts’ cover photos, with Account 100006744708316 uploading this image (ID # 1562330914001717) on October 30, 2014, and Account 100006969765481 uploading it (image ID # 1535033240072320) on November 10, 2014.

19. There is probable cause to believe that both accounts are owned and operated by a man named Gerald Wayne Ledford, whose date of birth is the same one as listed on the two user accounts, and who resides at the Ledford premises at 2423 North 2nd Street, Clinton, Iowa.

a. When conducting a Facebook “friend” search for Account 100006969765481, the location of Clinton, Iowa appears below the display name “Gerry Ledford.”

b. The Iowa State driver’s license photo for the person listed as Gerald Wayne Ledford in Clinton, Iowa, appears to be the same person depicted in the cover photos from October 24, 2014 and other photos posted in both Facebook accounts.

c. As set forth above, both accounts are logged into primarily by a computer using the same IP address, 173.28.71.42, which is subscribed to at the Ledford premises by Ledford’s apparent mother-in-law, who recently quitclaimed the premises to Ledford’s apparent wife. That said, database searches indicate that in addition to Ledford’s apparent mother-in-law and wife, six other people currently list or have listed the Ledford premises as their residential address, including Gerald W. Ledford.

d. According to Facebook records, a computer device at the 173.28.71.42 IP address accessed Account 100006744708316 and conducted 58 actions on the account on October 19, 2014, including searching for the Islamic Society of Boston Cultural Center (ISBCC) at 20:51:02 UTC. Additionally, a computer device at the 173.28.71.42 IP address accessed Account 100006744708316 and conducted 21 actions on the account on October 20, 2014, the day that the threats were discovered on the ISBCC’s account and the day that the citizen posted the question, “who you trying to threaten” directly to Account 100006744708316.



e. Although both accounts were accessed most frequently by a computer device at the 173.28.71.42 IP address, which is subscribed to at the Ledford residence, Facebook records state that the accounts were also accessed by a computer device at 16 other IP addresses. Two of those IP addresses, from which computer devices had accessed both accounts, no longer had associated records available from the Internet service providers. Thirteen of those IP addresses had been accessed by telephone number (563) 249-1196, which according to Tracfone records, were most recently registered to an individual (FNU LNU) with a residential, billing and shipping address listed as Clinton, Iowa 52732. Tracfone records also identify the most recent activation date of this account as February 24, 2014 and the telephone model associated with this account as STLGL38CPWP. According to Facebook search warrant returns, the telephone model used to upload a number of photos in both Accounts 100006744708316 and 100006969765481 was LG-L38C. Tracfone compliance representative, Angie LNU, stated that Tracfone prepaid accounts do not require a customer name upon activation. Finally, a computer device at the 173.27.140.55 IP address accessed Account 100006969765481 on November 4, 2014 at 22:38:12 UTC, and according to Mediacom records that IP address is subscribed to by a person at another address in Clinton, Iowa. A Google Web Search of this location shows a residential area with single family homes. Because of all the evidence giving probable cause to believe that the accounts were owned and operated by Ledford and that the threats were posted by him as well, there is probable cause to believe that Ledford occasionally used other IP addresses to connect to Facebook. This would be consistent with my training and experience, from which I am aware that a person who has a Facebook account can log into that account from a

computer device and network belonging to someone else.

f. On or about March 31, 2015, surveillance observed people matching depictions of Gerald Ledford and his wife together at the Ledford premises and driving a Jeep Grand Cherokee Laredo, Iowa state license plate 551ZMP, registered to his wife.

g. Many of the posts on the Facebook accounts appear to be written by Ledford family members under the impression that they are corresponding to their relative, Gerry Ledford. For example, some posts use familial language such as “us Ledfords”, “look like ur daddy”, “My brother Gerry”, ” thats gerry its ok brother”, “I would LOVE to see u & Lou !! Miss yawl”, and offer to correspond through personal e-mail.

h. Gerald Wayne Ledford has access to firearms. As described below Ledford has threatened others with a firearm before. Moreover, both accounts contain images of firearms at various times, claiming that the firearms depicted belong to the Facebook accounts’ owner. Moreover, Facebook Account 100006744708316 contains what appears to be a picture of the camouflaged rifle contained in one of the threat posts to the ISBCC about 18 days before the threat itself was posted. The picture, image ID # 1550425121858963, depicts the rifle being held in the right hand of an unidentified person wearing blue jeans and a dark outer top with red markings. The person appears to be seated, holding the rifle with the right hand, resting the rifle butt into the right chest area and with the left arm resting against the wooden platform. In the background are large blue tarps and some unidentified standing objects. The photo bears the title, “I got my rifle back.laser sighted.1and a quarter lb trigger pull.i’m ready for bam bam (or bambi”. This particular image appears to be of the same individual and weapon posted to

the ISBCC's Facebook page on October 20, 2014. According to Facebook records, it was uploaded by a computer device using IP 173.28.71.42 (which as set forth above was registered to the Ledford premises) on October 2, 2014, at 22:27:43 UTC.

20. Although federal investigators have not contacted Gerald Wayne Ledford about this investigation, there is probable cause to believe that he is aware of it and has attempted to minimize the chances that he is charged or apprehended.

a. On or about November 30, 2014, while the federal investigation was ongoing the operator of Account 100006969765481 posted a statement purportedly from Gerry Ledford saying, "Mi dare Someone trying to use my identity. . Not only will they go to jail ..But they won't give a piece of candy on Top of it!!!!"

b. On or around March 25, 2015, 36 Facebook posts from Account 100006969765481 were observed as having been deleted or hidden, approximately 16 of which relate to or referenced the Islamic State (ISIS/ISIL) or Islam. The remaining posts range in topic from cold winter weather, professional football, the XL Pipeline, Michael Brown and the Ferguson, Missouri police department, Al Sharpton, or getting even with individuals who have wronged him.

c. On or about March 27, 2015, Ledford updated his Facebook status, listing his location as that of Gettysburg, PA. On March 31, 2015, however, Ledford was observed during surveillance with his wife at the Ledford premises in Clinton, Iowa.

d. On or about April 6, 2015, Ledford made the following post to Account 100006969765481:

Me and luanne are spltting up tomorrow! Its been a long time coming, I going to Colorado, she's staying here,we just don't see eye to eye anymore,I would appreciate your prayers, its gonna be rough at firstbut God doesn't close doors with out opening another.thank you friends and family,I appreciate you

being there for us

e. Nevertheless, on April 28, 2015, agents conducting physical surveillance observed a Dodge Ram pickup truck Iowa state license plate CIH094, believed to be driven by Gerald Ledford, and more than one man present at the residence.

**D. Probable Cause to Believe that the Posts Were Intended as Threats**

21. Although at this time investigators have no evidence that Ledford intended to actually shoot anyone at the ISBCC, there is probable cause to believe that Ledford intended the posts to be perceived as threats.

22. A day before the threats were found by ISBCC, Ledford used Account 100006744708316 to search for the term “Islamic State of Iraq and the Levant”, a designated foreign terrorist organization, and then, about two minutes later, to search for the term “Islamic Society of Boston Cultural Center (ISBCC)”.

23. Both messages promise violence both explicitly — “we will destroy you here” — and implicitly — “This is for you” accompanied by a picture of a person with a long gun.

24. Both messages include no indication that Ledford was joking or intended sarcasm, such as standard indications of such on the Internet, such as “LOL” (“laughing out loud”), “jk” (“just kidding”), “:)” (a smiley face), or “;)” (a winking smiley face).

25. Both messages promise violence against Muslims and were posted on the wall of an organization that serves Muslims.

26. They were posted not as a general rant on the poster’s own Facebook wall, but rather on the Facebook wall of an organization that serves the people whom the posts threaten.

27. Ledford conducted searches for Islamic or Islamic-extremist organizations on Facebook, including the following:

a. on or about July 22, 2014, a search from Account 100006744708316 for

“ Hamas HMS”;

b. on or about September 30, 2014, searches from Account 100006969765481 for “ Hamas”; and

c. on November 02, 2014, searches from Account 100006969765481 for “ American Muslims United”, “ Muslim American Society - Greater Los Angeles Chapter”, “ Muslims of Black American Descent”, and “ African American Muslim Single Black Man Online”.

28. Although Account 100006969765481 contains multiple posts derogating Islamic terrorist groups, it also includes multiple posts derogating Muslims in general, including:

a. a post on or about October 22, 2014, apparently reacting to news reports of shootings by recent convert to Islam in Canada, saying, “ Why can't the American and Canadian gov's just admit that a person with Islamic tendencies be called a Islamic terrorist!! Oh ya Obama is one!!!”;

b. a post on or about November 18, 2014, saying, “ All you thinking converting to satans religion.be my guest.If Isis doesn't get you killed. Then one of us American so kill you anyway.. God is great..Allah is Satan..Muhammad a child molester”, with a hyperlink to a YouTube video entitled “ American Douglas McCain killed fighting alongside ISIS”; and

c. a post on or about February 13, 2015, apparently reacting to news reports about the murder of three Muslim students of the University of North Carolina at Chapel Hill, saying “ Wow a white man kills three islamists and it's a hate crime?Good job brother! [aggressive emoticon] Now we only have to take 999999 more of there innocent people!!! An eye for a eye,!!!”

29. Ledford has threatened others with a firearm before. Ledford has a 2013 charge of “intimidation with a dangerous weapon” in Iowa for which he received a two-year suspended sentence, as well as one year of unsupervised probation. Reports from this incident state that he discharged a firearm and cite the victim as claiming that Ledford, “threatened to kill her, light the house on fire, and then kill himself.”

30. Ledford has also used Account 100006969765481 to warn people that he will do anything to obtain vengeance:

a. In a post on or about January 26, 2015, he said, “To the people that do me wrong, There is nothing legal or illegal that I wont do’moral or imoral right or wrong Evil or not to get even with you,no matter where you hide!!!![evil smiley face emoticon].”

b. In a post on or about March 24, 2015, he said, “Tonight a guy started someReally bad shit with me.he does not Know me obviously.When someone does me wrong there is NOTHING I Won’t doto get even (nothing)if the police won’t do something then I will It would be easy to plant something in his truck that he would do many years In prison.That’s if I don’t get him first.If he wants to live a long time free he willstay clear of me.You know who you are.you have never met anyone like me and you will loose!!!!”

31. Based on the facts set forth above, there is probable cause to believe that Ledford intentionally transmitted a communication in interstate commerce containing a threat to injure another person on or about October 19, 2014, in violation of 18 U.S.C. § 875(c).

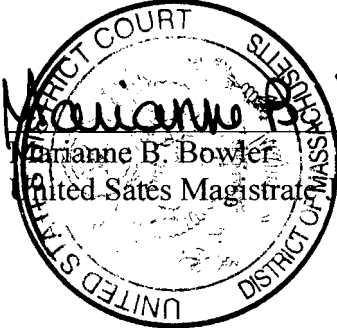
Sworn to under the pains and penalties of perjury,

Trinity D. Schroeter  
Trinity D. Schroeter  
Special Agent, FBI

Sworn to and subscribed before me,

Dated: June 1, 2015

Marianne B. Bowler, USMJS  
Marianne B. Bowler  
United States Magistrate Judge

The seal of the United States District Court for the District of Massachusetts is circular. It features the words "DISTRICT COURT" at the top and "DISTRICT OF MASSACHUSETTS" at the bottom. In the center, there is a smaller circle containing the words "UNITED STATES".